

Exhibit D

STEPHANIE D. SHON - 10/10/2018

1 --

2 UNITED STATES DISTRICT COURT

3 EASTERN DISTRICT OF NEW YORK

4 -----x

5 HILLARY LAWSON, KRISTINA HALLMAN,
6 STEPHANIE CALDWELL, MOIRA HATHAWAY,
7 MACEY SPEIGHT, ROSEMARIE PETERSON, and
8 LAUREN FULLER,

Plaintiffs,
Case No.
1:17-cv-06404 (BMC)

9 -against-

10 HOWARD RUBIN, JENNIFER POWERS,
11 and the DOE COMPANY.

Defendants.

12 -----x

13 October 10, 2018
14 10:22 a.m.

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19 Deposition of STEPHANIE D. SHON, taken by
20 Plaintiffs, pursuant to Notice, at the offices
21 of Balestriere Fariello, 225 Broadway, New
22 York, New York, before William Visconti, a
23 Shorthand Reporter and Notary Public within and
24 for the State of New York.

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21 ALSO PRESENT:
JENNIFER LEE, Para Balestriere Fariello
22 HOWARD RUBIN
JENNIFER POWERS
23 YIFAT V. SCHNUR, ESQ.
DAVID FORREST

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IT IS HEREBY STIPULATED AND AGREED
by and between the attorneys for the
respective parties herein that filing and
sealing be and the same are hereby waived.

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to the form
of the question, shall be reserved to the
time of the trial.

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed
and sworn to before any officer authorized
to administer an oath with the same force and
effect as if signed and sworn to before the
Court.

1 STEPHANIE D. SHON

2 Miss [REDACTED] and Mr. Rubin? 11:35:34

3 A. I met [REDACTED] when she flew in for 11:35:36
4 the first time, yes. 11:35:40

5 Q. Where did you meet [REDACTED] when she 11:35:40
6 flew in for the first time? 11:35:44

7 A. I don't remember. I think it 11:35:45
8 might have even been -- it could have been a 11:35:46
9 restaurant or a bar or something. 11:35:49

10 Q. Was it at Mr. Rubin's apartment? 11:35:51

11 A. No. 11:35:52

12 Q. Was there ever a time that you 11:35:53
13 were in Mr. Rubin's apartment with Miss [REDACTED]? 11:35:56

14 A. Yes. 11:35:59

15 Q. I guess taking a step back. Have 11:36:02
16 you ever been in Mr. Rubin's apartment? 11:36:04

17 A. Yes. 11:36:05

18 Q. Do you know the address of that 11:36:07
19 apartment? 11:36:08

20 A. By apartment which one are you 11:36:09
21 referring to? 11:36:12

22 Q. I will take a step back. 11:36:13
23 Previously we mentioned through I believe it 11:36:15
24 was Exhibit B that there was a dungeon in one 11:36:18
25 of Mr. Rubin's apartments. 11:36:22

1 STEPHANIE D. SHON

2 A. Yes. 11:36:24

3 Q. Have you ever been in the 11:36:25
4 apartment with a dungeon? 11:36:25

5 A. Yes. 11:36:27

6 Q. Have you ever been in any other 11:36:28
7 apartment owned by Mr. Rubin? 11:36:29

8 A. No. 11:36:30

9 Q. Have you ever been in any other 11:36:32
10 property owned by Mr. Rubin? 11:36:33

11 A. Not to my knowledge. 11:36:35

12 Q. Were you ever in the apartment 11:36:36
13 with the dungeon with Miss [REDACTED]? 11:36:40

14 A. Yes. 11:36:43

15 Q. Have you ever been in the dungeon 11:36:46
16 with Miss [REDACTED]? 11:36:47

17 A. No. 11:36:48

18 Q. Do you know if Miss [REDACTED] has 11:36:49
19 ever been in the dungeon? 11:36:51

20 A. No. 11:36:57

21 MR. GROSSMAN: I'm going to mark 11:37:52
22 this as Shon Exhibit C. 11:37:54

23 (Shon Exhibit C for identification, 11:37:54
24 WhatsApp message chain between Miss Shon 11:37:54
25 and Miss Powers.) 11:38:20

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1 STEPHANIE D. SHON

2 MS. ALBERT: That's it, I have 13:19:37

3 nothing further. Thank you. 13:19:38

4 MR. GROSSMAN: Nothing from me. 13:19:40

5 (TIME NOTED: 1:19 P.M.) 13:19:42

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8 STEPHANIE D. SHON

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10 Subscribed and sworn to before me

11 this ____ day of _____, 2018

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1 STATE OF NEW YORK) Pg__ of__Pgs

2 ss:

3 COUNTY OF NEW YORK)

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5 I wish to make the following changes, for the
6 following reasons:

7 PAGE LINE

8 _____ CHANGE: _____

9 REASON: _____

10 _____ CHANGE: _____

11 REASON: _____

12 _____ CHANGE: _____

13 REASON: _____

14 _____ CHANGE: _____

15 REASON: _____

16 _____ CHANGE: _____

17 REASON: _____

18 _____ CHANGE: _____

19 REASON: _____

20 _____ CHANGE: _____

21 REASON: _____

22 _____ CHANGE: _____

23 REASON: _____

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1 C E R T I F I C A T E

2 STATE OF NEW YORK)

3 : ss.

4 COUNTY OF NEW YORK)

5 I, WILLIAM VISCONTI, a Shorthand Reporter and
6 Notary Public within and for the State of New York,
7 do hereby certify:

8 That prior to being examined, the witness named in
9 the foregoing deposition was duly sworn to testify the truth,
10 the whole truth, and nothing but the truth;

11 That said deposition was taken down by me in
12 shorthand at the time and place therein named and
13 thereafter reduced by me to typewritten form and that the
14 same is a true, correct, and complete transcript of said
15 proceedings.

16 Before completion of the deposition, review of the
17 transcript [] was [X] was not requested. If requested,
18 any changes made by the deponent (and provided to the
19 reporter) during the period allowed are appended hereto.

20 I further certify that I am not interested in the
21 outcome of the action.

22 Witness my hand this 15th day of October 2018.

23

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WILLIAM VISCONTI

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E X H I B I T S

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DESCRIPTION

PAGE

4

(Shon Exhibit A for

23

5

identification, WhatsApp

6

conversations between Miss Shon

7

and Howard Rubin.)

8

(Shon Exhibit B for

35

9

identification, WhatsApp

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conversation between Miss Powers

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and Mr. Rubin.)

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(Shon Exhibit B1 for

49

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identification, WhatsApp

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conversation between Miss Powers

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and Mr. Rubin with fewer

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redactions.)

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(Shon Exhibit C for

57

18

identification, WhatsApp message

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chain between Miss Shon and Miss

20

Powers.)

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(Shon Exhibit D for

109

22

identification, e-mail from Miss

23

Shon to Mr. Rubin.)

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